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*Attorneys for Amazon Defendants*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse )  
and wrongful death personal representative )  
of DANIEL DEBEER, deceased, )  
Plaintiff, )

v. )

AMAZON LOGISTICS, INC. d/b/a )  
PRIME, AMAZON.COM, INC., )  
AMAZON.COM SERVICES LLC, )  
AAF555 LLC, NORTHWEST EXPRESS, )  
LLC and JUSTIN NZARAMBDA, )  
Defendants. )

Civil Action No. 23-CV-33-ABJ

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**MOTION TO FILE RESPONSE TO PLAINTIFF'S  
MOTION TO COMPEL AS A NON-PUBLIC DOCUMENT**

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Defendants Amazon Logistics, Inc., Amazon.com, Inc., and Amazon.com Services LLC (hereinafter "Amazon"), by and through their undersigned counsel, and respectfully submits this motion requesting permission from the Court to file Amazon's response to the Plaintiff's Motion to Compel (ECF 50) as a non-public document. In support of this motion, Amazon states as follows:

1. Counsel for Amazon has attempted to confer with Plaintiff's counsel regarding this *Motion*, but was unable to receive a response from Plaintiff's counsel on whether Plaintiff opposes or does not oppose this *Motion* prior to filing.

2. On October 24, 2023, the Court entered a Protective Order which allowed the parties to designate materials as "Confidential." *See* ECF 48, p. 2.

3. The Protective Order further provides that "[a] party seeking to file documents containing Confidential Discovery Material under seal must comply with the Court's rules and electronic docketing procedures for filing motions for leave to file under seal." *Id.* at p. 8.

4. On November 29, 2023, Plaintiff filed a Motion to Compel Amazon to Produce Complete Insurance Policies and to Remove the Designation as 'Confidential,' (ECF 50) requesting the Court order further disclosure and remove the 'Confidential' Designation from Amazon's insurance materials.

5. Amazon has designed its produced insurance material as 'Confidential' pursuant to the Protective Order.

6. In order to provide factual support for its claims, Amazon must discuss the discovery material it has labeled as 'Confidential' and identify the specific information that justifies its good faith designation.

7. If Amazon were to publicly file its response, it would inadvertently reveal some of the information that it seeks to keep confidential pursuant to the Protective Order.

**WHEREFORE,** Defendants Amazon Logistics, Inc., Amazon.com, Inc., and Amazon.com Services LLC respectfully request the Court allow the response to Plaintiff's Motion to Compel Amazon to Produce Complete Insurance Policies and to Remove the Designation as 'Confidential,' (ECF 50) as non-public pursuant to the Protective Order.

**DATED** this 15<sup>th</sup> day of December, 2023.

AMAZON LOGISTICS, INC., AMAZON.COM, INC., AND  
AMAZON.COM SERVICES LLC, Defendants

By: /s/ Stuart R. Day  
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*Attorneys for Amazon Defendants*

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon all counsel of record by electronic service via the CM/ECF system this 15<sup>th</sup> day of December, 2023.

/s/ Stuart R. Day  
Stuart R. Day